

ORAL ARGUMENT NOT YET SCHEDULED

**IN THE UNITED STATES COURT OF APPEALS
FOR THE D.C. CIRCUIT**

Ruby Freeman and Wandrea' Moss,

Plaintiffs-Appellees,

v.

Rudolph W. Giuliani,

Defendant-Appellant.

No. 24-7021

**REPLY IN SUPPORT OF MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF, DEFERRED APPENDIX, AND FINAL BRIEFS**

Defendant-Appellant, Rudolph W. Giuliani (“Appellant”), respectfully submits this reply in support of his motion for an extension of time to file his reply brief, deferred appendix, and final briefs.

* * *

Appellees opposition to Appellant’s motion is meritless for two reasons.

First, Appellees ignore Appellant’s argument, that he seeks to maintain the status quo ante, when the settlement agreement was executed, at which time Appellant had three weeks remaining to file his reply brief. This position both makes sense and is fair. It would be wasteful for the undersigned to continue drafting a reply brief, if the reply were to become moot by a completed settlement. By the same token, if the settlement terms are not completed over the next few

weeks, it would be unfair, and prejudicial to the Appellant, for the undersigned to have just a few days left to draft and submit a reply brief. That would not provide sufficient time to address the numerous and lengthy issues on appeal. Appellees ignored this point and thus concede it.

Second, it is neither sensible nor fair to tie a deadline *in this Court*, to a deadline in some *other court*, which has before it different issues, and where, surely, Plaintiffs can (but did not) seek an adjournment to avoid potentially unnecessary work. In any event, even if the schedule of one judge leads to unnecessary work, that does not mean that this Court's schedule should do so.

CONCLUSION

For the foregoing reasons, Appellant respectfully requests that the Court grant his motion for an extension of time.

Dated: February 13, 2025
New York, New York

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CERTIFICATE OF COMPLIANCE

I certify that the foregoing motion complies with the typeface and style requirements of Federal Rule of Appellate Procedure 27(d)(1)(E), and the word limit of Federal Rule of Appellate Procedure 27(d)(2)(A), because the motion was prepared in double-spaced, 14-point Times New Roman font, and contains 259 words as determined by the word-count function of Microsoft Word.

/s/ Kenneth A. Caruso
KENNETH A. CARUSO

CERTIFICATE OF SERVICE

I certify that the foregoing motion was served on all parties through the Court's CM/ECF system.

/s/ Kenneth A. Caruso
KENNETH A. CARUSO